

REMARKS

Claims 1, 2, 5, 8, 9, 13 and 15-18 as attached have been amended to more clearly define the invention and correct typographical errors.

Support for the amendments is found in the Application in connection with Figure 6, in the existing claims and other places. Specifically, support for “automatically selecting a task from a plurality of different tasks” is found in the Application on page 10 lines 9-12 and other places. Support for “automatically selecting” a “particular task schedule from” a “plurality of displayable task schedules, in response to received information identifying an event” is found in the Application on page 10 lines 22-25 and other places.

I. Requirement for Information

The Examiner requests information concerning the product NOVIUS sold by SMS prior to becoming Siemens, specifically concerning the scheduling functions and operating manuals or other information concerning Siemens NOVIUS Scheduling ASP, discussed in the article “First Customers Up-and-Running with Siemens NOVIUS Scheduling ASP” from the PR Newswire. Specifically, when the product was under contract and sold, any operating manuals or other information provided the customers, or any public disclosures of this product prior to August 2000.

An Information Disclosure Statement containing requested documents is enclosed and the date of sale of NOVIUS Scheduling ASP appears to be July 2000. These documents and associated products do not show or suggest, or provide any 35 USC 112 compliant enabling description of, the claimed features including “applying” “decision information for automatically selecting a task from a plurality of different tasks” and other features. These document and associated products also do not show or suggest, or provide any 35 USC 112 compliant enabling description of, “automatically selecting” a “particular task schedule from said plurality of displayable task schedules, in response to received information identifying an event”.

II. Rejection of claim 13 under 35 USC 112.

Claim 13 is rejected under 35 USC 112 second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter.

Specifically, claim 13 is rejected for lack of antecedent basis of the term “the plurality of circumstances”.

The Examiner has correctly suggested this term should be “plurality of occurrences”. The claim is amended to recite “plurality of occurrences” and the Applicant thanks the Examiner for her help in this matter. Consequently this ground of Rejection is no longer deemed applicable and the Applicant respectfully requests its withdrawal.

III. Rejection under 35 U.S.C. 102(b)

Claims 1-19 are rejected under 35 U.S.C. 102(b) as being anticipated by US Patent application 2004/0039626 - Voorhees. These claims are deemed to be patentable for the reasons given below.

Amended claim 1 recites a method for “assigning an identifier to at least one of a plurality of displayable task schedules” comprising “initiating display of at least one interface menu supporting user entry of decision information for automatically selecting a task from a plurality of different tasks and assigning an identifier representing a selected task to a particular task schedule of a plurality of displayable task schedules associated with a corresponding plurality of different entities, in response to received information identifying an event, said particular task schedule being associated with a particular entity of said corresponding plurality of different entities; receiving decision information entered via said at least one interface menu; applying the received decision information; and automatically assigning a task representative identifier representing a selected task to be performed by said particular entity, to said task schedule associated with said particular entity, based on the application of the received decision information, in response to received information identifying an event”. These features are not shown (or suggested) in Voorhees.

The system of claim 1 initiates display of an “interface menu supporting user entry of decision information” that “automatically” assigns an “identifier representing a selected task to be performed by an entity” and the task is “automatically” selected “from a plurality of different tasks” by applying the “decision information” in response to “received information identifying an event”. The system advantageously enables user customizable, automatic, event driven, healthcare worker (and medical device) task scheduling. For example, assume, “Dr. Jones is the Radiologist who protocols all spiral CT exams. When a spinal CT is

ordered, that exam will be added to Dr. Jones' protocol work list 1, and at the same time, can be added to a CT technologist work list 1 of exams to be performed on the day for which it was ordered. When Dr. Jones protocols the exam, it would be removed from his work list 1. When the exam is tracked to the Begin Procedure step, it can be removed from the technologist work list 1" (Application page 12 lines 10-15). This **automatic** task selection and assignment significantly improves hospital personnel and resource allocation, planning and operation and is not suggested by the scheduling or appointment systems of the cited references. Such scheduling or appointment systems merely schedule tasks or appointments that are pre-selected by a user and in contrast to the claimed system, do NOT automatically select tasks from multiple available tasks or select a worker from multiple workers and assign tasks to the selected worker.

The Voorhees system concerns "a system and method for tracking appointment data". The Voorhees system "includes a clinic engine operable to allow an appointment target to identify a first block of time as available-to-meet time and an appointment engine operable to make available at least a portion of the first block of time to an appointment seeker in response to an appointment request. The system may also include an appointment seeker interface that allows the appointment seeker to schedule a first appointment during the first block of time and a notification engine operable to notify the appointment target of the first appointment. In other embodiments, the clinic engine may be further operable to allow the appointment target to identify allowable locations for the first appointment" (Voorhees par 0001, par. 0007). Consequently, Voorhees describes an appointment management system that fails to show or suggest "decision information" that "automatically" assigns an "identifier representing a selected task to be performed by an entity" and the task is "automatically" selected "from a plurality of different tasks" by applying the "decision information" in response to "received information identifying an event".

Voorhees nowhere provides any 35 USC 112 compliant enabling description of, or contemplates use of, user entered "decision information" for automatically selecting a "task" from "a plurality of different tasks" without user intervention in response to "received information identifying an event". Voorhees merely "allows" a user (the appointment seeker) to "schedule a first appointment during" a "first block of time" identified by a user employing a "clinic engine" (Voorhees par 0007). Voorhees is a user drive system ("a clinic engine operable to allow" a user an ("**appointment target**") to "identify a first block of time"; "allows" a user an ("**appointment seeker**") to "schedule a first appointment" etc (Voorhees

par 0007). Voorhees does NOT suggest use of “decision information” that “automatically” without user intervention assigns an “identifier representing a selected task to be performed” and “automatically” selects a task to be performed “from a plurality of different tasks” in response to “received information identifying an event”.

Voorhees in par. 0023-5, 0029 and 0043-4 relied on in the Rejection on page 4 nowhere shows, suggests, or provides any 35 USC 112 compliant enabling description of “automatically” selecting a task “from a plurality of different tasks” by applying “decision information” in response to “received information identifying an event”. The Voorhees sections relied on merely describe a passive appointment system without any ability to automatically (without user intervention) “select” and “assign” tasks in response to “received information identifying an event”. Voorhees par. 0029 specifically relied, on just shows update of an appointment calendar to indicate a period of time of a worker is no longer available.

Voorhees in par. 0029 states “update engine 242” recognizes “when a seeker” (a user) “has scheduled an appointment with a target and automatically updates the targets calendar to indicate that the scheduled time is no longer available for appointment”. That is update engine 242 updates a schedule in response to user action not “decision information” and does not “select” and “assign” tasks in response to “received information identifying an event”. Voorhees in par. 0029 also states “in some embodiments, update engine 242 may also recognize when information located within legacy system 236 has changed and initiate an **updating** of the **information** located within **legacy** system 236 to reflect the change”. However, Voorhees nowhere describes what information is updated or even what legacy system 236 is. Consequently, Voorhees fails to show, suggest or provide any 35 USC 112 compliant enabling disclosure of “automatically” selecting a task “from a plurality of different tasks” by applying “decision information” in response to “received information identifying an event”.

Further, in par 0025 of Voorhees an identification of a Doctors schedule is done manually by a user (an appointment seeker) using clinic engine 104. Specifically, par. 0025 states “appointment seeker 118, 120, 122 may search for an individual or type of target using appointment engine 106”. Consequently, Voorhees teaches manually driven appointment scheduling which is **fundamentally different** to the automatic system claimed and does not suggest “automatically” selecting a task “from a plurality of different tasks” by applying “decision information” in response to

“received information identifying an event”. Voorhees nowhere mentions or contemplates such selection.

There is no mention, discussion or contemplation anywhere in Voorhees of “**application**” of user entered “**decision information**” to select and assign tasks in response to “received information identifying an event”. Further, there is no recognition in Voorhees of the advantages of the user customizable, automatic, event driven, healthcare worker (and medical device) automatic task selection and assignment features or any other motivation or reason for modifying Voorhees system to incorporate the claimed features.

Appointment and scheduling systems exemplified by Voorhees are used to schedule use of resources, personnel and patients to perform **already identified tasks**. Such systems do not have the ability to **select and assign** tasks or to **select and assign** particular workers in response to “received information identifying an event”. Such scheduling systems also do NOT have the ability to “assign” tasks based on the data or actions performed on the data and specifically “based on the application of the received decision information”. This capability allows a user to efficiently automatically schedule personnel and devices to deliver healthcare to a patient based on occurrence of events. This capability and associated claimed arrangement is not contemplated by the cited reference. Consequently, withdrawal of the rejection of amended claim 1 under 35 USC 102(b) is respectfully requested.

Amended dependent claim 2 is considered to be patentable based on its dependence on claim 1. Claim 2 is also considered to be patentable because Voorhees does not show (or suggest) a system involving “automatically selecting said particular task schedule from said plurality of displayable task schedules, in response to said decision information and received information identifying an event”. Voorhees is a user drive system (“a clinic engine operable to allow” a user an (“**appointment target**”) to “identify a first block of time”; “allows” a user an (“**appointment seeker**”) to “schedule a first appointment” etc (Voorhees par 0007). Voorhees does NOT suggest a system for “**automatically** selecting said particular task schedule from said plurality of displayable task schedules, in response to said **decision** information **and** received information identifying an event”.

Voorhees also does not mention or contemplate use of “decision information” that “automatically” assigns an “identifier representing a selected task to be performed” and “automatically” selects a task to be performed “from a plurality of

different tasks” in response to “received information identifying an event” in combination with initiating “display of menu elements prompting a user to identify” data associated with “decision information” used in “assigning the task representative identifier to the task schedule associated with the particular entity in response to a predetermined event”. Voorhees Figure 4 paragraphs 0026, 0040 and 0043 mention preferences and privileges may be called (par. 0043) in response to user login but provides negligible disclosure on what such preferences and privileges are. The only related disclosure appears to be in par 0039 which states “in other words, a group of targets may be treated collectively as a single target, with each target in the group sharing some set of assigned privileges”. Voorhees provides no 35 USC 112 compliant enabling disclosure of “menu elements **prompting** a user to identify at least one of (a) the predetermined **event triggering** application of the decision information in assigning the task representative identifier to the task schedule, (b) a source of **the** decision information, (c) decision information comprising a **procedure** for processing data associated with a task to determine a task schedule for listing the task representative identifier”.

Dependent claim 3 is considered to be patentable based on its dependence on claim 1. Claim 3 is also considered to be patentable because Voorhees does not show (or suggest) a system in which the “the decision information comprises a **logical procedure** for processing data associated with a **task** to identify a task schedule for incorporating the task representative identifier”. Voorhees does not mention or contemplate use of a “logical procedure” for “processing data associated with a task to identify a **task** schedule”. Voorhees paragraphs 0023, 0025, 0029, 0041 and 0043-44 do not mention such a logical procedure at all. Voorhees par. 0036 mentions conditional logic comprising rules which “may control how data that is applied to the domain is distributed to users in the domain”. However, a “domain” as used in Voorhees appears to be some group of resources used by a grouping of users and has no bearing on (and provides no 35 USC 112 compliant enabling disclosure of) a “logical procedure” for “processing data associated with a task to identify a **task** schedule” in a system that “automatically” selects a “particular task schedule from said plurality of displayable task schedules, in response to said decision information and received information identifying an event”.

Dependent claim 4 is considered to be patentable based on its dependence on claims 1 and 3.

Amended dependent claim 5 is considered to be patentable based on its dependence on claim 1. Claim 5 is also considered to be patentable because Voorhees does not contemplate automatically and **programmatically** without user intervention “assigning” a **task representative identifier** to “at least one of a plurality of displayable task schedules associated with a corresponding plurality of different **entities**” comprising “at least one of (a) a category of users, (b) one or more users currently designated to perform a healthcare worker role and (c) a medical device or system”. Contrary to the Rejection statements on page 5, Voorhees fails to provide any suggestion of the combination of features of claim 5. Specifically, Figure 6 and paragraphs 0023-25, 0041 and 0043-44 fail to suggest “**application**” of user entered “**decision information**” that “automatically” and “programmatically without user intervention” assigns an “identifier representing a selected task to be performed by” at least one of (a) a category of users, (b) one or more users currently designated to perform a healthcare worker role and (c) a medical device or system”.

Dependent claim 6 is considered to be patentable based on its dependence on claim 1. Claim 6 is also considered to be patentable because Voorhees does not show (or suggest) a system in which the “the decision information identifies the predetermined event and...the predetermined event corresponds to at least one of (a) patient admission, (b) beginning of a medical procedure, (c) end of a medical procedure and (d) a user defined event based on information acquired”. Voorhees paragraphs 0023-5, 0029 and 0043-4 relied on in the Rejection concern user driven appointment management. The relied on reference sections do NOT show or suggest “decision information” that “automatically” assigns an “identifier representing a selected task to be performed” and “automatically” selects a task to be performed “from a plurality of different tasks” in response to “received information identifying an **event**” that corresponds to “at least one of (a) patient admission, (b) beginning of a medical procedure, (c) end of a medical procedure and (d) a user defined event based on information acquired”.

Dependent claim 7 is considered to be patentable based on its dependence on claim 1. Claim 7 is also considered to be patentable because Voorhees does not show (or suggest) the features of claim 1 in combination with “automatically” applying the “received decision information in **prioritizing** a plurality of **task representative identifiers** of a **task schedule** associated with a particular entity in response to occurrence of a triggering **event**”. Voorhees paragraphs 0023-5, 0029 and 0043-4 relied on in the Rejection page 6 concern user driven appointment management. The relied on reference sections do NOT show or

suggest “decision information” that “automatically” applies the “received decision information in **prioritizing** a plurality of **task** representative **identifiers** of a **task schedule** associated with a particular entity in response to occurrence of a triggering **event**”. Voorhees does not discuss prioritizing tasks at all.

Amended Independent claim 8 is considered to be patentable for reasons given in connection with claims 1-7 and for additional reasons. Claim 8 recites a method for “assigning an identifier to at least one of a plurality of task schedules” comprising “initiating display of at least one interface menu supporting user entry of decision information for assigning a task representative identifier to a particular task schedule of a plurality of displayable task schedules associated with a corresponding plurality of different entities, said particular task schedule being associated with a particular entity of said corresponding plurality of different entities and accessible by the particular entity, the decision information including data identifying” an “executable procedure for processing data associated with a task to identify a task schedule for incorporating the task representative identifier” and “an event for triggering application of the procedure in allocating the task representative identifier to the identified task schedule” receiving “decision information entered via the at least one interface menu” automatically “selecting said particular task schedule from said plurality of displayable task schedules, in response to said decision information and received information identifying an event” and “assigning said task representative identifier representing a task to be performed by said particular entity, to said task schedule associated with said particular entity, based on the application of the received decision information, in response to occurrence of the triggering event”.

Voorhees is not concerned with and does not contemplate “**automatically**” “selecting said particular task schedule from said plurality of displayable task schedules, in **response** to said **decision** information **and** received information identifying an **event**”. Voorhees paragraphs 0023-5, 0029 and 0043-4 relied on in the Rejection page 6 concern **user driven** appointment management. The relied on reference sections do NOT show or suggest “decision information” that “automatically” selects a “particular task schedule from said plurality of displayable task schedules, in **response** to” received “information identifying an **event**”. Voorhees in par. 0029 states “update engine 242” recognizes “when a seeker” (a user) “has scheduled an appointment with a target and automatically updates the targets calendar to indicate that the scheduled time is no longer available for appointment”. That is update engine 242 updates a schedule in response to **user action** not predetermined “decision information” and does not “select” and “assign” tasks in

response to “received information identifying an event”. Voorhees in par. 0029 also states “in some embodiments, update engine 242 may also recognize when information located within legacy system 236 has changed and initiate an **updating** of the **information** located within **legacy** system 236 to reflect the change”. However, Voorhees nowhere describes what information is updated or even what legacy system 236 is. Consequently, Voorhees fails to show, suggest or provide any 35 USC 112 compliant enabling disclosure of “automatically” “selecting said particular task schedule from said plurality of displayable task schedules, in response to said decision information and received information identifying an event”.

The Voorhees system does NOT have the ability to “assign” tasks based on the data or actions performed on the data and specifically “based on the application of the received decision information” and “in response to occurrence of the triggering event”. Voorhees does NOT show or suggest “initiating display of at least one interface menu supporting user entry of decision information for assigning a task representative identifier to a task schedule associated with a **particular** entity and accessible by the particular entity”. This capability allows a user to efficiently schedule personnel and devices to deliver healthcare to a patient based on **occurrence of events**. For example, a “radiologist may use the system of the present inventions to create an entry on an appropriate entity’s “to be scheduled” worklist, including the radiologist’s own worklist, such as by using a menu option. The menu option may programmatically schedule such an event if a certain code is entered by or for the radiologist upon completion of the analysis of the results, i.e. the results code acts as a triggering event to schedule the more detailed ultrasound” (Application page 11 lines 5-15). These features and capability are nowhere suggested in Voorhees.

The decision information includes a procedure and a “logical procedure may condition allocation of the task to a task schedule associated with a particular entity upon one or more occurrences of a phenomenon which may or may not be coincident. For example, it may be desirable to programmatically condition assigning a subsequent task to a user or entity based on what also has or is happening as indicated by a response entered into the same or another worksheet 1” (Application page 10 line 22 to page 11 line 2). Voorhees does NOT show or suggest use of “decision information” including: “a procedure for processing data associated with a task to **identify** a task schedule for incorporating the task representative identifier, and an **event** for **triggering** application of the **procedure** in allocating the task representative identifier to the identified task schedule” associated with a “particular entity” and accessible by the “particular entity”. The identification of the Doctors

schedule is done manually by a user (an appointment seeker) using clinic engine 104 in Voorhees and NOT by “a procedure” identified by data in “decision information”. Specifically, par. 0025 states “appointment seeker 118, 120, 122 may search for an individual or type of target using appointment engine 106”. Consequently, Voorhees teaches manually driven appointment scheduling which is **fundamentally different** to the automatic system claimed and does not suggest “automatically” “selecting said particular task schedule from said plurality of displayable task schedules, in response to said decision information and received information identifying an event”.

Amended dependent claim 9 is considered to be patentable based on its dependence on claim 8 and for reasons given in connection with claim 1. Claim 9 is also considered to be patentable because Voorhees does not show (or suggest) the “at least one interface menu supports user entry of decision information for **automatically** programmatically **selecting** a **task** from a plurality of different tasks and assigning an identifier representing a selected task to said particular task schedule of said plurality of displayable task schedules, in **response** to received **information** identifying an **event**”. Voorhees also does not suggest a system including the combination of features of claim 9 in which the “the data associated with a task comprises at least one of (a) a medical procedure identifier for a scheduled procedure, (b) a time and date of performance of a medical procedure, (c) patient medical record information, (d) location of performance of a medical procedure, (e) patient type identifier and (f) patient physical characteristics”.

Dependent claim 10 is considered to be patentable based on its dependence on claim 8 and for reasons given in connection with claims 1, 6 and 8. Claim 10 is also considered to be patentable because Voorhees does not show (or suggest) a system including the combination of features of claim 10 in which the “the **triggering event** corresponds to at least one of (a) patient admission, (b) beginning of a medical procedure, (c) end of a medical procedure and (d) a user defined event based on acquired information”.

Dependent claim 11 is considered to be patentable based on its dependence on claim 8. Claim 11 is also considered to be patentable because Voorhees does not show (or suggest) a system including the combination of features of claim 11 including “acquiring the data associated with a task”.

Dependent claim 12 is considered to be patentable based on its dependence on claim 8. Claim 12 is also considered to be patentable because

Voorhees does not show (or suggest) a system including the combination of features of claim 12 in which the “the procedure conditions allocation of the task to the task schedule associated with the particular entity upon **coincidence** of a **plurality of occurrences**, and...further including acquiring data to identify the coincidence of the plurality of occurrences”. Contrary to the Rejection statement on page 7, Voorhees paragraphs 0023-5, 0029 and 0043-4 relied on concern user driven appointment management and do NOT show or suggest the ability to “assign” tasks based on the data or actions performed on the data and specifically “based on the application of the received decision information” and “in response to occurrence of the triggering event”. The reference also fails to show or suggest “assigning” tasks “in response to occurrence of the triggering event” and specifically in response to “coincidence of a plurality of occurrences”. The reference also fails to show or suggest “acquiring data to **identify the coincidence** of the plurality of occurrences”. The cited reference passages simply do not show or suggest such features and the Rejection fails to make any showing that specifically identifies where such a combination of features are present.

Amended dependent claim 13 is considered to be patentable based on its dependence on claim 8. Claim 13 is also considered to be patentable because Voorhees does not show (or suggest) a system including the combination of features of claim 13 in which the “the triggering event is **conditioned** upon coincidence of a plurality of **occurrences**, and...further including acquiring data to identify the **coincidence** of the plurality of occurrences”. Contrary to the Rejection statement on page 7, Voorhees paragraphs 0023-5, 0029 and 0043-4 relied on concern user driven appointment management and do NOT show or suggest the ability to “assign” tasks based on the data or actions performed on the data and specifically “based on the application of the received decision information” and “in response to occurrence of the triggering event”. The reference also fails to show or suggest “assigning” tasks “in response to occurrence of the triggering event” and specifically in response to “**coincidence of a plurality of occurrences**”. The reference also fails to show “acquiring data to **identify the coincidence** of the plurality of occurrences”. The cited reference passages simply do not show or suggest such features and the Rejection fails to make any showing that specifically identifies where such a combination of features are present.

Dependent claim 14 is considered to be patentable based on its dependence on claim 8. Claim 14 is also considered to be patentable because Voorhees does not show (or suggest) a system including the combination of features

of claim 14 involving “applying the received decision information in **removing a task representative identifier** from the **task schedule** associated with the particular entity in response to occurrence of **a triggering event**”. Contrary to the Rejection statement on page 8, Voorhees paragraphs 0023-5, 0029 and 0043-4 relied on concern user driven appointment management and do NOT show or suggest the ability to “assign” tasks based on the data or actions performed on the data and specifically “based on the application of the received decision information” and “in response to occurrence of the triggering event”. The relied on sections fail to make any suggestion of “applying the received **decision information** in **removing** a task representative identifier from the **task schedule** associated with the particular entity in response to occurrence of **a triggering event**”. Removal of task identifiers is not discussed or mentioned anywhere in the cited reference.

Amended Independent claim 15 is considered to be patentable for reasons given in connection with claim 1 and for additional reasons. Claim 15 is also considered to be patentable because Voorhees does not show (or suggest) “a method for providing a user interface for assigning an identifier to at least one of a plurality of displayable task schedules” comprising “in response to a user command” initiating “display of at least one interface menu supporting user entry of decision information for automatically programmatically selecting a task from a plurality of different tasks and assigning an identifier representing a selected task to a particular task schedule of a plurality of displayable task schedules associated with a corresponding plurality of different entities, in response to received information identifying an event, said particular task schedule being associated with a particular entity of said corresponding plurality of different entities” and “initiating display of an updated task schedule associated with the particular entity, the updated task schedule being generated in response to applying received decision information, in automatically assigning a task representative identifier representing a task to be performed by said particular entity, to said task schedule associated with said particular entity in response to received information identifying an event”.

As previously explained Voorhees is not concerned with, and does **not** contemplate, “decision information for automatically programmatically selecting a task from a plurality of different tasks and assigning an identifier representing a selected task to a particular task schedule of a plurality of displayable task schedules associated with a corresponding plurality of different entities, in response to received information identifying an event”. Voorhees also does show or suggest “initiating display of at least one interface menu supporting user entry of decision information

for automatically programmatically selecting a task from a plurality of different tasks and assigning an identifier representing a selected task to a particular task schedule of a plurality of displayable task schedules”. Voorhees paragraphs 0023-5, 0029 and 0043-4 relied on concern **user driven** appointment management and do NOT show or suggest “applying received **decision information**, in **automatically** assigning a task representative identifier representing a task to be performed by said particular entity, to said task schedule associated with said particular entity in response to received information identifying an event”. The systems described do NOT have the ability for “automatically programmatically selecting a task from a plurality of different tasks and assigning an identifier representing a selected task to a particular task schedule” in “response to received information identifying an event”. This capability allows a system to efficiently schedule personnel and devices to deliver healthcare to a patient based on occurrence of events **without user** intervention. This capability and associated claimed arrangement is absent from the cited reference.

Amended Independent claim 16 is considered to be patentable for reasons given in connection with claims 1-15 and for additional reasons.

Amended Independent claim 17 is considered to be patentable for reasons given in connection with claims 1-15 and for additional reasons.

Amended Independent claim 18 is a system claim mirroring method claim 1 and is considered to be patentable for same reasons as claim 1.

Dependent claim 19 embodies the steps of claim 1 and is considered to be patentable for the same reasons as claim 1. Consequently, withdrawal of the rejection of claims 1-19 under 35 USC 102(b) is respectfully requested.

In view of the above amendments and remarks, Applicant submits that the Application is in condition for allowance, and favorable reconsideration is respectfully requested.

Respectfully submitted,



Date: June 3, 2005

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3 June 2005

Date



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